

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: EDWARD J BOWMAN Debtor, TOYOTA MOTOR CREDIT CORPORTATION Movant, v. EDWARD J BOWMAN, and ROBERT SEITZER, Trustee, Respondents.	Bankruptcy No. 24-14308-amc Chapter 7
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MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Movant, Toyota Motor Credit Corporation (the “Movant”), by and through its undersigned counsel, Bernstein-Burkley, P.C., and files this Motion for Relief from the Automatic Stay (the “Motion”), representing as follows:

THE PARTIES

1. Respondent, Edward J Bowman (the “Debtor”) is an adult individual with a place of residence located at 780 S. 52nd Street, Apt 618, Philadelphia, PA 19143.
2. Robert Seitzer is the duly appointed Chapter 7 Trustee and is currently acting in such capacity.

JURISDICTION AND VENUE

3. This matter is a core proceeding and this Court has jurisdiction pursuant to 28 U.S.C. § 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. Movant seeks relief pursuant to 11 U.S.C. § 362(d) and FRBP 4001 and 9014.

FACTUAL BACKGROUND

4. On or about December 2, 2024, the Debtor filed a voluntary petition for relief pursuant to Chapter 7 of the Bankruptcy Code.

5. On or about December 2, 2020, the Debtor purchased a 2020 Toyota Camry, VIN: 4T1J11BKXLU015586 (the “Vehicle”), pursuant to a Retail Installment Contract (the “Contract”) with the Movant, a true and correct copy of which is attached hereto as **Exhibit A**.

6. Movant has a secured interest in the Vehicle, as evidenced by the Certificate of Title attached hereto as **Exhibit B**.

7. The Contract requires monthly payments of \$548.14, which amounts are due on 15th day of each month.

8. As of the date of this Motion, the Debtor is in default of their monthly payment obligations to Movant in the amount of \$1,771.28. The Debtor is currently due for the December 2024 payment.

9. The Total Debt due on the Contract as of February 19, 2025, was \$15,474.54.

10. The J.D. Power value for the 2020 Toyota Camry, VIN: 4T1J11BKXLU015586 is \$18,175.00. A true and correct copy of a printout showing that value is attached hereto as **Exhibit C**

11. Movant is entitled to relief from the automatic stay for cause, including the lack of adequate protection, because the Debtor has failed to make their monthly payments to Movant. 11 U.S.C. §362(d)(1).

WHEREFORE, Movant, Toyota Motor Credit Corporation, respectfully requests that this Honorable Court enter an Order, pursuant to 11 U.S.C. § 362(d), granting Movant relief from stay with respect to the 2020 Toyota Camry, VIN: 4T1J11BKXLU015586.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/ Keri P. Ebeck

Keri P. Ebeck, Esq.

PA I.D. # 91298

kebeck@bernsteinlaw.com

601 Grant Street, 9th Floor

Pittsburgh, PA 15219

Phone (412) 456-8112

Fax: (412) 456-8135

Dated: February 28, 2025

Counsel for Toyota Motor Credit Corporation